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Attorneys for Plaintiff Pauline Short

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PAULINE SHORT,

**On behalf of herself and all others similarly
situated,**

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES LLC,

a foreign corporation,

Defendant.

Civil No. 3:14-cv-00471-YY

DECLARATION OF ROBERT S.
SOLA IN SUPPORT OF PLAINTIFF
PAULINE SHORT'S REPLY IN
SUPPORT OF MOTION TO COMPEL
RESPONSES TO PLAINTIFF'S
INTERROGATORIES AND
REQUEST FOR PRODUCTION OF
DOCUMENTS

I, Robert S. Sola, hereby declare as follows:

1. I am one of the attorneys representing Plaintiff Pauline Short in this action and I make this declaration based on my personal knowledge.

2. Between November 10, 2014 and May 26, 2015, I had dozens of communications with Equifax's counsel regarding discovery matters, including the terms of a protective order, obtaining frozen scans of Plaintiff and Paula Short, the terms of an order to produce documents of Paula Short, obtaining discovery relating to class members, obtaining policy manuals and obtaining vendor agreements.

3. The second motion for extension was proposed by Equifax.

4. On May 12, 2016, Equifax's counsel informed me that Equifax would not produce the information on the consumers whose file contained the tax liens that Plaintiff had provided to Equifax.

5. Attached as Exhibit L is a true and correct copy of Committee Notes on Rules—2006 Amendment, *Subdivision (b)(2)* [of Rule 26] obtained online from the Legal Information Institute of Cornell University Law School.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 11, 2016

/s/ Robert S. Sola
Robert S. Sola

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been electronically filed with the clerk of the court using the CM/ECF system which will send notice of such filing to the following counsel:

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Dated this 11th day of July 2016.

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